

FILED

1 **TIA HOLLIS, INDIVIDUALLY**  
2 a/k/a/ "Mee-Chee the Mentor" dba CRIPS  
3 5455 Wilshire Blvd. Ste.2100  
4 Los Angeles, CA 90036  
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7 IN PRO SE

2024 MAR 20 PM 2:44

CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
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8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT

10 **TIA HOLLIS, INDIVIDUALLY**  
11 **A/K/A MEE-CHEE THE MENTOR**  
12 **DBA CRIPS**

13 Plaintiff,

14 vs.

15 **MICHAEL RENDER AN**  
16 **INDIVIDUAL,**

17 **A/K/A KILLER MIKE, DBA THE**  
18 **MICHAEL RENDER GROUP;**  
19 **EUGENE HENLEY AN**  
20 **INDIVIDUAL, A/K/A BIG U, DBA**  
21 **DEVELOPING OPTIONS;**  
22 **COURTNEY SILLS AN**  
23 **INDIVIDUAL, A/K/A**  
24 **HIGHERLEVELBEAR, DBA SILLS**  
25 **ENTERTAINMENT; CHARLESTON**  
26 **WILSON AN INDIVIDUAL, DBA**  
27 **EXOTIC POP DISTRIBUTION; WILL**  
28 **BRONSON AN INDIVIDUAL, A/K/A**

Case No.: Number

2:24-CV-02292-MWF-BFMx

**COMPLAINT FOR TRADEMARK  
INFRINGEMENT; DAMAGES,  
AND DECLARATORY RELIEF;**

**(1) FEDERAL TRADEMARK  
INFRINGEMENT [15 U.S.C. 1114  
LANHAM ACT 32. 34]**

**(2) TRADEMARK DILUTION {15  
U.S.C. 1125(C); CALIFORNIA  
BUSINESS & PROFESSIONS CODE  
14330}**

**(3) FALSE DESIGNATION OF  
ORIGIN [15 U.S.C. 1125(A)]**

**(4) COMMON LAW UNFAIR  
COMPETITION UNDER SECTION  
43(A)**

COMPLAINT FOR TRADEMARK INFRINGEMENT; DAMAGES, AND DECLARATORY RELIEF; (1)  
FEDERAL TRADEMARK INFRINGEMENT [15 U.S.C. 1114 LANHAM ACT 32. 34] (2) TRADEMARK  
DILUTION {15 U.S.C. 1125(C); CALIFORNIA BUSINESS & PROFESSIONS CODE 14330} (3) FALSE  
DESIGNATION OF ORIGIN [15 U.S.C. 1125(A)] (4) COMMON LAW UNFAIR COMPETITION UNDER  
SECTION 43(A) (5) UNFAIR BUSINESS PRACTICES {CALIFORNIA BUSINESS & PROFESSIONS CODE  
17200}; AND (6) UNJUST ENRICHMENT - 1

1 WILLISACTIVE, DBA ACTIVE  
2 MANAGEMENT; DOES 1-10

3 Defendant

(5) UNFAIR BUSINESS  
PRACTICES {CALIFORNIA  
BUSINESS & PROFESSIONS CODE  
17200}; AND

(6) UNJUST ENRICHMENT

6 COMES NOW, PLAINTIFF TIA HOLLIS, INDIVIDUALLY, to hereby  
7  
8 file its Complaint against Defendants MICHAEL RENDER, COURTNEY SILLS,  
9  
10 EUGENE HENLEY, CHARLESTON WILSON, and WILL BRONSON, and  
11 Does 1-10, inclusive (collectively "Defendants").

12 **JURISDICTIONAL ALLEGATIONS**

- 13  
14 1. This court has federal subject matter jurisdiction over this subject matter  
15 pursuant to 28 U.S.C. 1331 and 1338(a) and (b), by virtue of 15 U.S.C.  
16 1051 et seq; in that the case arises out of 43(a) of the LANHAM ACT of  
17 TRADEMARK INFRINGEMENT, and supplemental jurisdiction under  
18 28 U.S.C. 1367(a) and 1338(a)(b).  
19  
20 2. Venue is proper, inter alia, under 28 U.S.C. 1391(b) because on  
21 information and belief a substantial part of the events or omissions giving  
22 rise to the claim occurred in this judicial district.  
23  
24

25  
26 COMPLAINT FOR TRADEMARK INFRINGEMENT; DAMAGES, AND DECLARATORY RELIEF;(1)  
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1 3. Personal jurisdiction exists over defendants because on information and  
2 belief, defendants conduct business in California and in this judicial  
3 district, or otherwise avail themselves of the privileges and protections of  
4 the laws of the state of California, such that this courts assertion of  
5 jurisdiction over defendants does not offend traditional notions of fair play  
6 and due process.  
7  
8

9  
10 **SUMMARY OF ACTION**

11 4. This action seeks to enjoin Defendants unlawful and unfair competition  
12 with Plaintiff TIA HOLLIS an individual, A/K/A MEE-CHEE THE  
13 MENTOR, DBA CRIPS, through infringing on Plaintiff HOLLIS'  
14 trademark to falsely advertise a competing product.  
15

16 5. Plaintiff HOLLIS brings this action for damages and declaratory, and  
17 permanent injunctive relief for Federal and common law trademark  
18 infringement contributory trademark infringement, unfair competition and  
19 fake advertising, false designation of origin, false description arising out  
20 of the willfully infringing and unlawful activities of Defendants, which  
21 have caused irreparable harm to Plaintiff.  
22  
23  
24

25 **PARTIES**

26 COMPLAINT FOR TRADEMARK INFRINGEMENT; DAMAGES, AND DECLARATORY RELIEF;(1)  
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1 6. Plaintiff TIA HOLLIS, an individual A/K/A “MEE-CHEE THE  
2 MENTOR”, DBA CRIPS, is a resident of Los Angeles, California.  
3

4 7. Plaintiff is informed and believes that Defendant MICHAEL RENDER, an  
5 individual A/K/A “KILLER MIKE”, DBA THE MICHAEL RENDER  
6 GROUP, is now, and was at the time of the filing of this Complaint and at  
7 all intervening times, a Georgia resident and a Georgia business entity of  
8 unknown status operating throughout the U.S., a Principal place of  
9 business located at 5665 New Northside Drive, Ste. 110, Atlanta, Georgia  
10 30328.  
11

12 8. Plaintiff is informed and believes that Defendant EUGENE HENLEY, an  
13 individual, A/K/A BIG U, DBA DEVELOPING OPTIONS INC AND  
14 UNEEK MUSIC is now, and was at the time of the filing of this  
15 Complaint and at all intervening times a California resident, and a  
16 California business entity of unknown operating status throughout the U.S.  
17 with a Principal place of business located at 5444 Crenshaw Bl. Los  
18 Angeles, California 90043  
19

20 9. Plaintiff is informed and believes that Defendant COURTNEY SILLS, an  
21 individual, A/K/A “HIGHER LEVEL BEAR”, DBA SILLS  
22

23  
24  
25  
26 COMPLAINT FOR TRADEMARK INFRINGEMENT; DAMAGES, AND DECLARATORY RELIEF;(1)  
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1 ENTERTAINMENT, is now, and was at the time of the filing of this  
2 Compliant and at all intervening times a Georgia resident, and a Georgia  
3 business entity of unknown operating status operating throughout the U.S.  
4 a principal place of business located at 320 Elderberry Trail, Fayetteville,  
5 Georgia 30214  
6  
7

8 10. Plaintiff is informed and believes that defendant WILL BRONSON, an  
9 individual, A/K/A "WILL IS ACTIVE", DBA ACTIVE  
10 MANAGEMENT, is now, and was at the time of the filing of this  
11 Complaint and at all intervening times a California resident, and a  
12 California business entity of unknown operating status operating  
13 throughout the U.S. with a principal place of business located at 2219 W.  
14 Olive Ave, #128 Burbank, California, and 1019 N. Fairfax Ave., Los  
15 Angeles, California 90046.  
16  
17  
18

19 11. Plaintiff is informed and believes that Defendant CHARLESTON  
20 WILSON, an individual, DBA EXOTIC POP DISTRIBUTION is now,  
21 and was at the time of the filing of this Complaint and at all intervening  
22 times a Texas resident, and a Texas business entity, unknown operating  
23  
24  
25

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1 status operating throughout the U.S. with a principal place of business  
2 located at 1000 S. Loop W #190, Houston, Texas 77054.

3  
4 12. Plaintiff is informed and believe and thereon allege that, at all times  
5 mentioned in this Complaint, each of the defendants was the agent,  
6 servant, employee, representative, subsidiary, affiliate, partner, member,  
7 associate or conspirator of one or more of the other Defendants were done  
8 in the course or scope of the relationship and with the knowledge and  
9 consent of their principal employers, owners, superiors, affiliates, masters,  
10 parent corporations, partners, members, associates, or representatives,  
11 except as otherwise specifically alleged within this Complaint.  
12

13  
14  
15 13. Plaintiff is informed and believes and thereon alleges that at all times  
16 mentioned herein Defendants MICHAEL RENDER, EUGENE HENLEY,  
17 COURTNEY SILLS, CHARLESTON WILSON, WILL BRONSON, and  
18 DOES 1-10, INCLUSIVE, AND EACH OF THEM (COLLECTIVELY,  
19 "Defendants"), were the agents, servants, and employees of every other  
20 Defendant and the acts of each Defendant, as alleged herein, were  
21 performed within the course and scope of that agency, service or  
22 employment.  
23  
24  
25

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**INJURY TO PLAINTIFFS**

14. Plaintiff exclusively owns website, <https://WWW.CRIPSWORLDWIDE.COM>,

and two (2) registered United States trademarks associated with the  
Community Revolution In Progress, the Crips brand.

15. Plaintiff exclusively owns a registered United States trademark for the  
“CRIPS” organization under Registration No. 5,877,377, registered  
October 8, 2019, for International Class 35, business services. Attached  
herewith as “Exhibit A”.

16. Plaintiff exclusively owns a registered United States trademark for the  
“CRIPS” organization under Registration No. 6.926,377, registered  
December 13, 2022, for the International Class 041, education,  
entertainment, and television services. Attached herewith as “Exhibit B”.

17. Plaintiff exclusively owns one United States Copyright for the CRIP  
WALK under the certificate Registration No. PAu004134130, registered  
effective date of May 24, 2022, for the category of dance.

18. Plaintiff exclusively owns a registered United States trademark for the  
“BLOODS” organization under Registration No. 6.026,461, registered

1 April 7, 2020, for the International Class 35, business services. Attached  
2 herewith as "Exhibit C".  
3

4 19. Plaintiffs extensive use of the service mark is documented and famous  
5 worldwide.  
6

7 20. Plaintiffs service mark is known for assisting several hundred  
8 organizations establish gang intervention programs throughout schools for  
9 the safe passage of children to and from school.  
10

11 21. Plaintiffs service mark is distinguished as a leader in community  
12 organizing of several thousand members that contribute to the plight of  
13 three basic human rights to Life, Liberty and the Security of People.  
14

15 22. Plaintiff has assisted in several hundred job fairs and training throughout  
16 the U.S.  
17

18 23. Plaintiff has distinguished itself as a leader in promoting, conducting, and  
19 arranging several community events throughout the U.S. that promotes  
20 Social Change.  
21

22 24. Plaintiff has produced numerous effective marketing solutions for  
23 community organizations that promote Public Safety through Conflict  
24 Resolution.  
25

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1 25. Despite having been met with life threatening opposition, and public  
2 outrage, Plaintiff, did covertly prevent outsiders from extorting and/or  
3 illegally profiting from the late ERMIA S JOSEPH ASGHEDOM a/k/a/  
4 NIPSEY HUSSLES' legacy, and the "MARATHON" brand he created.  
5

6  
7 26. Plaintiff, bravely, under significant goodwill, and on behalf of the late  
8 ASGHEDOM heirs, ON May 16, 2019, did apologetically and without  
9 malice, file an application with the USPTO for the trademark "THE  
10 MARATHON CONTINUES", serial numbers 88432608 and 88608749.  
11  
12 (Attached herewith as "Exhibit D")  
13

14 27. Plaintiff did, through intentional goodwill, secure the mark "THE  
15 MARATHON CONTINUES", which legally kept the Mark, "THE  
16 MARATHON CONTINUES", from being available for others to extort.  
17

18 28. Once secured, and as early as time permitted, Plaintiff engaged with the  
19 Cochran Firm and embarked upon extreme vetting measures to ensure that  
20 ALL rights to Nipsey Hussles' "THE MARATHON CONTINUES", were  
21 relinquished ONLY to the heirs of the ERMIA S ASGHEDOM ESTATE.  
22  
23 HOLLIS did not request or receive any monies in the settlement.  
24

25 (Attached herewith as "Exhibit E")

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1 29. Due to Plaintiffs extensive use of the Mark, CRIPS, Plaintiff has been  
2 recognized in numerous articles appearing in both trade publications and  
3 those directed to the general public, including Billboard, Bloomberg Law,  
4 Complex, BET, and Vibe.  
5

6 30. Plaintiff has worked feverishly over the past 10 years to encourage and to  
7 protect the right to public safety, and human life in conjunction with the  
8 service mark.  
9

10 31. Plaintiff launched an internal campaign in 2018 aimed to pushback at  
11 very unsuspecting, well dressed hip-hop music executives, like Defendant,  
12 COURTNEY SILLS who continually use their public personas, influence  
13 and money to further supply and perpetuate violence and the senseless loss  
14 of life in our communities throughout the country. (Attached herewith as  
15 “Exhibit F)  
16  
17

18 32. Plaintiff is a patented inventor of the “Baby Hair Edge Pro”, beauty  
19 device. (Attached herewith as “Exhibit G)  
20  
21

22 33. Plaintiff is a formerly incarcerated ex-gang member who has acquired the  
23 necessary life skills to live and to assist others in living a meaningful,  
24 productive and crime free life.  
25

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1 34. Plaintiff has pioneered a non-profit organization with a focus on Black  
2 ingenuity. This program provides scholarships to the youth through the  
3 sales of merchandise that's consistent with Plaintiffs mark.  
4

5 35. Plaintiff has paid her debt to society for past shortcomings. Plaintiff has  
6 exercised consistent self-awareness and critical thinking which has  
7 encouraged California Superior Court Judges to expunge and dismiss  
8 Plaintiffs past felony record.  
9

10 36. Plaintiff has chosen to explore further options of acquiring a professional  
11 career as an attorney and is currently studying for the California BAR.  
12

13 37. Defendants and/or their agents are known members and or affiliates of the  
14 notorious Rolling 60's street-gang.  
15

16 38. Defendants and/or their agents have extensive and documented gang ties  
17 from Los Angeles to Georgia. (Attached herewith as "Exhibit H)  
18

19 39. Defendants, and/or their agents are multi-grammy award winning rappers,  
20 and entertainment industry affiliates. (Attached herewith as "Exhibit I)  
21

22 40. Defendant, Michael Render is a known Atlanta, Rolling 60 gang-member.  
23 Labeled a general, it is alleged he earned his gang-moniker "Killer Mike"  
24 from putting in work on unsuspecting victims (seemingly women).  
25

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1 41. Defendant, Killer Mike was recently arrested and charged with violently  
2 knocking a woman to the ground during a Los Angeles awards show.

3  
4 42. Defendant, Eugene Henley is a self-proclaimed leader of the notorious  
5 Rolling 60's gang, and goes by Big U.

6  
7 43. Defendant Big U is said to be known for initiating the Check-In trend.  
8 This soft form of extortion started when Big U began extorting many out-  
9 of-town entertainers to pay for protection upon their landing onto L.A.  
10 soil.

11  
12 44. Defendant Big U is alleged to be responsible for the L.A. to Atlanta  
13 Rolling 60's connection.

14  
15 45. Defendant, Big U, did have prior knowledge of Plaintiffs Mark and made  
16 aware that he was never given permission to use the Mark CRIP.

17  
18 46. Defendant, Big U and/or his agent, affiliate KENYA WARE, made  
19 continuous efforts to fraud, infringe, conspire, counterfeit, willfully and  
20 maliciously upon Plaintiffs registered Mark, without Plaintiffs permission  
21 or licensing. (Attached herewith as "Exhibit J")

22  
23 47. Defendant, COURTNEY SILLS, Bear, is a known shot caller and liaison  
24 for making deals, both in and outside of the industry.

25  
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1 48. Defendant COURTNEY SILLS and WILL BRONSON are both known to  
2 work in conjunction with one another to manage the entertainment career  
3 of Killer Mike.  
4

5 49. Defendant, WILL is known to have had prior knowledge that Plaintiff  
6 owned the Mark. (Attached herewith as "Exhibit K")  
7

8 50. Defendant, WILL did knowingly, willingly, maliciously, conspire,  
9 defraud and infringe upon Plaintiffs Mark.  
10

11 51. Defendant, CHARLESTON WILSON, was served an immediate demand  
12 to Cease and Desist, and to immediately stop the sale, advertising, posting,  
13 promotion, distribution, offering any and all merchandise bearing  
14 Plaintiffs Mark. (Attached herewith as "Exhibit L")  
15

16 52. Defendants and/or their agents are known affiliates with close ties to  
17 popular Atlanta rapper Clifford Harris, a/k/a/ T.I.  
18

19 53. T.I., is an industry executive, rapper, and owner of The Trap Museum.  
20 With a history of run-ins with the law, T.I. was indicted for being in  
21 possession of illegal machine guns and silencers. TI served time in prison  
22 after being convicted on Federal weapon and guns charges.  
23  
24  
25

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1 54. TI, along with other well-known celebrities have promoted and sold  
2 counterfeit merchandise on popular platforms such as NETFLIX, The  
3 Breakfast Club, and Revolt bearing Plaintiffs Mark. (Attached herewith as  
4 “Exhibit M)  
5

6 55. Defendants and/or their agents are known affiliates, with close gang ties  
7 to popular Atlanta rapper Sergio Kitchens, a/k/a Gunna. Gunna is a  
8 documented member of the notorious Rolling 60’s street-gang. (Attached  
9 herewith as “Exhibit H)  
10  
11

12 56. Gunna, recently plead guilty to RICO charges in the ongoing, infamous  
13 YSL case.  
14

15 57. Defendants and/or their agents, and affiliates publicly camouflage as  
16 unsuspecting activists and entertainers who perpetuate acts of domestic  
17 terrorism for gangs throughout communities from Los Angeles to Atlanta.  
18

19 58. Defendants, on February 20, 2019, communicated via text message of  
20 having prior knowledge that Plaintiff was the sole owner of the Mark(s).  
21 (Attached herewith as “Exhibit K)  
22

23 59. Defendants filed an application with the USPTO, on June 13, 2019, for  
24 Defendants same exact Mark. (Attached herewith as “Exhibit N)  
25

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1 60. Defendants operate an online storefront which markets, distributes, and  
2  
3  
4 <http://WWW.EXOTICPOPDISTRIBUTION.COM>. Plaintiffs only site for  
5  
6 merchandise is <https://WWW.CRIPSWORLDWIDE.COM>

7 61. On January 1, 2023, in its ongoing investigation of counterfeit sales of the  
8  
9 CRIPS brand, Plaintiff purchased counterfeit beverages from Defendants  
10  
11 for a cost of \$50.00 charged to the account of Plaintiff's investigator.  
(Attached herewith as "Exhibit L")

12 62. Defendants have intentionally, maliciously, and knowingly confused  
13  
14 consumers by advertising the beverages bearing Plaintiffs Mark as CRIP  
15  
16 A COLA Community Revolution In Progress.

17 63. Defendants have further maliciously, willfully, intentionally, and  
18  
19 knowingly conspired to misrepresent themselves as brand owners of  
20  
21 Plaintiffs tradename and Mark, and to deceitfully enter-into and secure a  
22  
23 fraudulent collaborative partnership with world-renowned, billionaire  
24  
25 entrepreneur, SHAWN CARTER (JAY-Z), and conspired to scam the  
mogul out of millions of dollars, without knowledge, or consent, or  
permission from Plaintiff. (Attached herewith as "Exhibit O")

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1 64. Jay Z was featured on Grammy award winning producer, Pharrell  
2 Williams song, "Entrepreneur", where the extremely influential, mogul  
3 rapped about the Plaintiffs brand, Crip A Cola. (Attached herewith as  
4 "Exhibit O")  
5

6 65. Despite having admitted via text message, that one of the Defendants'  
7 close associates, mother of their child was in fact the owner of the  
8 Mark(s) CRIPS and BLOODS and had exclusive rights to the Mark, on  
9 June 13, 2019, Defendants and or their agents filed an application with the  
10 USPTO, serial number 88472671 for Plaintiffs Mark under the name  
11 CRIP A COLA.( Attached herewith as "Exhibit(s) K & N")  
12  
13

14 66. On September 6, 2019, Defendants and or their agents received an  
15 application suspension letter from the USPTO for their application serial  
16 number 88472671.( Attached herewith as "Exhibit P")  
17  
18

19 67. Defendant's suspension letter for application serial number 88472671  
20 stated the reason for suspension was because Plaintiffs application for  
21 serial number 88312848 and serial number 88025930 have a prior filing or  
22 effective date than Defendants application. If the mark for serial numbers  
23 88312848 or 88025930 registers, the USPTO may refuse registration of  
24  
25

26 COMPLAINT FOR TRADEMARK INFRINGEMENT; DAMAGES, AND DECLARATORY RELIEF;(1)  
27 FEDERAL TRADEMARK INFRINGEMENT [15 U.S.C. 1114 LANHAM ACT 32. 34](2) TRADEMARK  
28 DILUTION {15 U.S.C. 1125(C); CALIFORNIA BUSINESS & PROFESSIONS CODE 14330} (3) FALSE  
DESIGNATION OF ORIGIN [15 U.S.C. 1125(A)](4) COMMON LAW UNFAIR COMPETITION UNDER  
SECTION 43(A) (5) UNFAIR BUSINESS PRACTICES {CALIFORNIA BUSINESS & PROFESSIONS CODE  
17200}; AND(6) UNJUST ENRICHMENT - 16

1 Defendants mark under Section 2(d) because of a likelihood of confusion  
2 with Plaintiffs registered mark(s). 15 U.S.C. 1052(d); see 37 C.F.R. 2.83;  
3 TMEP 1208.02( c ).  
4

5 68. Defendants application serial number 88472671 was suspended until  
6 Plaintiffs prior-filed application serial numbers 88312848 or 88025930  
7 either registered or abandoned. 37 C.F.R. 2,83( c ).  
8

9 69. Plaintiffs prior-filed application serial number 88025930, registered for  
10 the famous Mark CRIPS, on October 8, 2019, registration number  
11 5,877,377. Plaintiff abandoned prior-filed application serial number  
12 88472671.  
13  
14

15 70. Plaintiffs Mark, CRIPS is famous, distinctive, non-descriptive, non-  
16 generic and has no meaning outside of being the acronym for  
17 COMMUNITY REVOLUTION IN PROGRES.  
18

19 71. Defendants and or their agents are personal friends of Plaintiffs sons  
20 father, upon receiving first-hand information regarding Plaintiffs Mark,  
21 Defendants and or their agents acted in concert to conspire willfully,  
22 intentionally, maliciously, and egregiously to steal Plaintiffs intellectual  
23  
24  
25

26 COMPLAINT FOR TRADEMARK INFRINGEMENT; DAMAGES, AND DECLARATORY RELIEF;(1)  
27 FEDERAL TRADEMARK INFRINGEMENT [15 U.S.C. 1114 LANHAM ACT 32. 34](2) TRADEMARK  
28 DILUTION {15 U.S.C. 1125(C); CALIFORNIA BUSINESS & PROFESSIONS CODE 14330} (3) FALSE  
DESIGNATION OF ORIGIN [15 U.S.C. 1125(A)](4) COMMON LAW UNFAIR COMPETITION UNDER  
SECTION 43(A) (5) UNFAIR BUSINESS PRACTICES {CALIFORNIA BUSINESS & PROFESSIONS CODE  
17200}; AND(6) UNJUST ENRICHMENT - 17



1 properties, and to use them as their own. (Attached herewith as "Exhibit  
2 K")  
3

4 **FIRST CAUSE OF ACTION**

5 **(FEDERAL TRADEMARK INFRINGEMENT UNDER SECTION 32,**  
6 **34 OF THE LANHAM ACT 15 U.S.C. 1114(a), (1)(b), 1116(d) and**  
7 **1117(b)(c)**

8  
9 72. Plaintiff repeated and re-allege every allegation set forth in the  
10 Complaint, as set forth herein.  
11

12 73. Defendants were/are aware that Plaintiff is the registered trademark  
13 holder of the CRIPS brand. (SEE EXHIBIT A) Further, Plaintiffs  
14 registrations on the principal register give constructive notice of Plaintiffs  
15 ownership rights.  
16

17  
18 74. Defendants did not and with willful malicious intent, failed to obtain the  
19 consent or authorization of Plaintiff as the registered owner of the subject  
20 name and Mark to commercially distribute, sale, offer, exchange, broker,  
21 collaborate and market merchandise bearing the Plaintiffs Mark into the  
22 stream of commerce.  
23  
24

25  
26 COMPLAINT FOR TRADEMARK INFRINGEMENT; DAMAGES, AND DECLARATORY RELIEF;(1)  
27 FEDERAL TRADEMARK INFRINGEMENT [15 U.S.C. 1114 LANHAM ACT 32. 34](2) TRADEMARK  
28 DILUTION {15 U.S.C. 1125(C); CALIFORNIA BUSINESS & PROFESSIONS CODE 14330} (3) FALSE  
DESIGNATION OF ORIGIN [15 U.S.C. 1125(A)](4) COMMONLAW UNFAIR COMPETITION UNDER  
SECTION 43(A) (5) UNFAIR BUSINESS PRACTICES {CALIFORNIA BUSINESS & PROFESSIONS CODE  
17200}; AND(6) UNJUST ENRICHMENT - 18

1 75. Defendant(s) willfully, maliciously, intentionally and knowingly used in  
2 commerce the reproduction, counterfeit, copy, and or colorable imitation  
3 of Plaintiffs registered Mark in connection with the sale, offering for sale,  
4 distribution, or advertising of Plaintiffs goods by offering, advertising,  
5 promoting, retailing, selling, and distributing counterfeit beverages,  
6 namely soda, selling, and apparel bearing the trade name and Mark CRIP  
7 A COLA, COMMUNITY REVOLUTION IN PROGRESS.  
8  
9

10  
11 76. Defendants reproduced counterfeited, copied, and colorably imitated  
12 Plaintiffs registered Mark and applied such reproduction, counterfeit,  
13 copy, or colorable imitation to labels, signs, flyers, signs, prints, packages,  
14 wrappers, receptacles and/or advertisements intended to be used in  
15 commerce upon or in connection with the sale, offering for sale,  
16 distribution, and/or advertising of goods. Defendants thereupon offered,  
17 advertised, promoted, retailed, sold and distributed through  
18 <http://www.exoticpopdistribution.com>, <http://www.therealcripacola.com>,  
19 and @cripacola on Instagram, the counterfeit beverages, namely soda and  
20 apparel bearing the trade name and Mark CRIPS COMMUNITY  
21 REVOLUTION IN PROGRESS IN CRIP A COLA.  
22  
23  
24  
25

26 COMPLAINT FOR TRADEMARK INFRINGEMENT; DAMAGES, AND DECLARATORY RELIEF;(1)  
27 FEDERAL TRADEMARK INFRINGEMENT [15 U.S.C. 1114 LANHAM ACT 32. 34](2) TRADEMARK  
28 DILUTION {15 U.S.C. 1125(C); CALIFORNIA BUSINESS & PROFESSIONS CODE 14330} (3) FALSE  
DESIGNATION OF ORIGIN [15 U.S.C. 1125(A)](4) COMMON LAW UNFAIR COMPETITION UNDER  
SECTION 43(A) (5) UNFAIR BUSINESS PRACTICES {CALIFORNIA BUSINESS & PROFESSIONS CODE  
17200}; AND(6) UNJUST ENRICHMENT - 19

1 77. Defendants did egregiously conspire intentionally, willfully, and  
2 maliciously to misrepresent themselves as owners of Plaintiffs trade name  
3 and Mark, CRIPS, and to deceitfully enter into and secure a fraudulent  
4 collaborative partnership with world renowned, billionaire, entrepreneur  
5 SHAWN CARTER, an individual, a/k/a/JAY Z. Defendants conspired to  
6 scam millions of dollars from SHAWN CARTER without the knowledge,  
7 or consent, or permission, or license to do so from Plaintiff.  
8

9  
10  
11 78. Defendants egregious and intentional use and sale of fake, pirated, and  
12 counterfeit items, and defraud the consumer who believes that the  
13 merchandise is authentic items manufactured by Plaintiff, in violation of  
14 15 U.S.C. 1114(a).  
15

16 79. Defendants continue and knowingly use Plaintiff trade name and Mark  
17 without Plaintiffs consent or authorizations constitutes intentional  
18 infringement of Plaintiffs federally registered trademarks in violation of  
19 Section 32 of the LANHAM ACT, 15 U.S.C. 1114.  
20  
21

22 **SECOND CAUSE OF ACTION**

23 **DILUTION UNDER SECTION 43(C) OF THE LANHAM ACT 15**

24 **U.S.C. 1125(C)**

25  
26 COMPLAINT FOR TRADEMARK INFRINGEMENT; DAMAGES, AND DECLARATORY RELIEF;(1)  
27 FEDERALTRADEMARK INFRINGEMENT [15 U.S.C. 1114 LANHAM ACT 32. 34](2) TRADEMARK  
28 DILUTION {15 U.S.C. 1125(C); CALIFORNIA BUSINESS & PROFESSIONS CODE 14330} (3) FALSE  
DESIGNATION OF ORIGIN [15 U.S.C. 1125(A)](4) COMMONLAW UNFAIR COMPETITION UNDER  
SECTION 43(A) (5) UNFAIR BUSINESS PRACTICES {CALIFORNIA BUSINESS & PROFESSIONS CODE  
17200}; AND(6) UNJUST ENRICHMENT - 20



1 80. Plaintiffs Mark is "Famous" within the meaning of the LANHAM ACT  
2 and is distinctive in the states in which trademark registration was  
3 obtained by virtue of its substantial inherent and acquired distinctiveness  
4 of the Mark, the extensive use in relevant states wide, and the advertising,  
5 and publicity of the Plaintiffs goods and services bearing the Mark.  
6  
7

8 81. As a result of the substantial inherent and acquired distinctiveness in  
9 Plaintiffs Mark, extensive use in the states in which registration was  
10 obtained, and the wide advertising and publicity of the Mark, Plaintiffs  
11 Mark has become strong and is widely identified and respected.  
12

13 82. Upon information and belief, Defendants unlawful actions began long  
14 after Plaintiffs Mark became famous, and Defendants acted knowingly,  
15 deliberately, and willfully with the intent to the trade on Plaintiffs  
16 reputation and to dilute Plaintiffs Mark, Defendants conducts willful,  
17 wanton and egregious.  
18  
19

20 83. The actions of Defendants complained of herein are likely to injure the  
21 business reputation of Plaintiff and its Mark.  
22

23 84. Defendants intentional sale of fake, pirated and counterfeit goods and  
24 services bearing Plaintiff and its likely to cause confusion mistake, or to  
25

26 COMPLAINT FOR TRADEMARK INFRINGEMENT; DAMAGES, AND DECLARATORY RELIEF;(1)  
27 FEDERALTRADEMARK INFRINGEMENT [15 U.S.C. 1114 LANHAM ACT 32. 34](2) TRADEMARK  
28 DILUTION {15 U.S.C. 1125(C); CALIFORNIA BUSINESS & PROFESSIONS CODE 14330} (3) FALSE  
DESIGNATION OF ORIGIN [15 U.S.C. 1125(A)](4) COMMONLAW UNFAIR COMPETITION UNDER  
SECTION 43(A) (5) UNFAIR BUSINESS PRACTICES {CALIFORNIA BUSINESS & PROFESSIONS CODE  
17200}; AND(6) UNJUST ENRICHMENT - 21

1 deceive, mislead, betray, and defraud consumers to believe that the  
2 substantial imitations are genuine CRIPS brand goods and services.

3  
4 85. Defendants unauthorized and counterfeit use of Plaintiffs FAMOUS Mark  
5 has diluted and will continue to dilute and tarnish Plaintiffs name and  
6 Mark and is likely to detract from the distinctiveness of Plaintiffs Mark.  
7

8 86. Defendants conduct is intended to trade on Plaintiffs reputation and  
9 goodwill and the quality and high standards of Plaintiffs goods and  
10 services, Defendants failure to meet Plaintiffs strict regulations of  
11 material, design, craftsmanship, and services will mar the perception  
12 among consumers regarding Plaintiffs goods and services, will tarnish and  
13 dilute the strength and value of Plaintiffs Mark, and will saturate the  
14 market and culture with substandard and counterfeit goods and services.  
15

16  
17 87. Defendants egregious and intentional use and sale of fake pirated and  
18 counterfeit goods and services bearing Plaintiffs trademark is likely to  
19 cause confusion, or to cause mistake, or to deceive, mislead, betray, and  
20 defraud the consumer who believe the goods and services are authenticity  
21 manufactured by the Plaintiff.  
22  
23  
24  
25

26 COMPLAINT FOR TRADEMARK INFRINGEMENT; DAMAGES, AND DECLARATORY RELIEF;(1)  
27 FEDERALTRADEMARK INFRINGEMENT [15 U.S.C. 1114 LANHAM ACT 32. 34](2) TRADEMARK  
28 DILUTION {15 U.S.C. 1125(C); CALIFORNIA BUSINESS & PROFESSIONS CODE 14330} (3) FALSE  
DESIGNATION OF ORIGIN [15 U.S.C. 1125(A)](4) COMMONLAW UNFAIR COMPETITION UNDER  
SECTION 43(A) (5) UNFAIR BUSINESS PRACTICES {CALIFORNIA BUSINESS & PROFESSIONS CODE  
17200}; AND(6) UNJUST ENRICHMENT - 22

1 88. Defendants continuing and knowing use of "CRIPS" constitutes  
2 intentional infringement of Plaintiffs common law trademarks in violation  
3 of 15 U.S.C. 1125© and California common law, as well as dilution and  
4 injury to business reputation in violation of Cal. Bus & Prof. Code  
5 14330et seq.  
6  
7

8 89. Plaintiff has no adequate remedy at law to compensate it fully for the  
9 damages that have been caused and which will continue to be caused by  
10 Defendants unlawful acts unless they are enjoined by this court.  
11

12 **THIRD CAUSE OF ACTION**

13 **TRADEMARK FALSE DESIGNATION OF ORIGIN UNFAIR**  
14 **COMPETETION AGAINST DEFENDANTS IN VIOLATION OF 15**  
15 **U.S.C. 1125(a)**  
16  
17

18 90. Plaintiffs repeat and re-allege every allegation set forth in the Complaint,  
19 as set forth herein.  
20

21 91. Defendants conduct described above violate the LANHAM ACT, have  
22 unfairly competed with and injured and, unless immediately restrained  
23 will continue to injure Plaintiff, causing damage to Plaintiff in an amount  
24  
25

26 COMPLAINT FOR TRADEMARK INFRINGEMENT; DAMAGES, AND DECLARATORY RELIEF;(1)  
27 FEDERALTRADEMARK INFRINGEMENT [15 U.S.C. 1114 LANHAM ACT 32. 34](2) TRADEMARK  
28 DILUTION {15 U.S.C. 1125(C); CALIFORNIA BUSINESS & PROFESSIONS CODE 14330} (3) FALSE  
DESIGNATION OF ORIGIN [15 U.S.C. 1125(A)](4) COMMONLAW UNFAIR COMPETITION UNDER  
SECTION 43(A) (5) UNFAIR BUSINESS PRACTICES {CALIFORNIA BUSINESS & PROFESSIONS CODE  
17200}; AND(6) UNJUST ENRICHMENT - 23



1 to be determined at trial, and will cause irreparable injury to Plaintiffs  
2 goodwill and reputation associated with Plaintiffs Mark.  
3

4 92. Defendants have the legal obligation and responsibility to conduct a  
5 search before utilizing a trademark so as not to confuse or deceive  
6 consumers as to the origin of its name and Mark.  
7

8 93. Had defendants conducted a search they would have discovered Plaintiffs  
9 long-time use of its Mark in commerce as well as its as well as its state  
10 registrations.  
11

12 (a) USPTO registration #5,877,377, issued October 8, 2019.

13 (b) USPTO registration #6.926.377, issued December 13, 2022  
14

15 (c) California registration #201818010054, issued June 27, 2018.

16 94. Plaintiffs Mark is distinctive in the states in the states which trademark  
17 registration was obtained by virtue of its substantial inherent and acquired  
18 distinctiveness, extensive use in each state for which registration was  
19 obtained and the extensive marketing and publicity of the Mark.  
20  
21

22 95. Defendants egregious, malicious and intentional use and sale of fake,  
23 pirated and counterfeit items bearing Plaintiffs trademark unfairly  
24 competes with Plaintiff and is likely to cause confusion, mistake or to  
25

26 COMPLAINT FOR TRADEMARK INFRINGEMENT; DAMAGES, AND DECLARATORY RELIEF;(1)  
27 FEDERALTRADEMARK INFRINGEMENT [15 U.S.C. 1114 LANHAM ACT 32. 34](2) TRADEMARK  
28 DILUTION {15 U.S.C. 1125(C); CALIFORNIA BUSINESS & PROFESSIONS CODE 14330} (3) FALSE  
DESIGNATION OF ORIGIN [15 U.S.C. 1125(A)](4) COMMONLAW UNFAIR COMPETITION UNDER  
SECTION 43(A) (5) UNFAIR BUSINESS PRACTICES {CALIFORNIA BUSINESS & PROFESSIONS CODE  
17200}; AND(6) UNJUST ENRICHMENT - 24

1 deceive, mislead, betray and defraud consumers to believe that the  
2 substandard imitation goods and services are genuine CRIPS goods and  
3 services.  
4

5 96. Defendants continuing and knowing use of Plaintiffs Mark constitutes  
6 willful infringement, false designation of origin and unfair competition in  
7 violation of section 43(a) of THE LANHAM ACT, 15 U.S.C. 1125(a).  
8

9 **FOURTH CAUSE OF ACTION**

10 **COMMONLAW UNFAIR COMPETITION UNDER SECTION 43(a)**

11 **OF THE LANHAM ACT 15 U.S.C. 1125(a)**

12  
13 97. Plaintiff repeats and re-allege every allegation set forth in the Complaint,  
14 as set forth herein.  
15

16 98. Defendants unauthorized use of Plaintiffs Mark in interstate commerce  
17 wrongly and falsely designates, describes, or represents the infringing  
18 goods and services, and is likely to cause confusion, mistake and  
19 deception as to the affiliation, connection, or association of the infringing  
20 goods and services with Plaintiff.  
21

22 99. Defendant's actions therefore violate Plaintiffs rights in its distinctive  
23 marks violation of 15 U.S.C. 1125(a).  
24  
25

26 COMPLAINT FOR TRADEMARK INFRINGEMENT; DAMAGES, AND DECLARATORY RELIEF;(1)  
27 FEDERAL TRADEMARK INFRINGEMENT [15 U.S.C. 1114 LANHAM ACT 32. 34](2) TRADEMARK  
28 DILUTION {15 U.S.C. 1125(C); CALIFORNIA BUSINESS & PROFESSIONS CODE 14330} (3) FALSE  
DESIGNATION OF ORIGIN [15 U.S.C. 1125(A)](4) COMMONLAW UNFAIR COMPETITION UNDER  
SECTION 43(A) (5) UNFAIR BUSINESS PRACTICES {CALIFORNIA BUSINESS & PROFESSIONS CODE  
17200}; AND(6) UNJUST ENRICHMENT - 25

1 100. Defendants conduct with respect to Plaintiffs Mark has caused and  
2 unless enjoined by this court, will continue to cause serious and  
3 irreparable harm, while unjustly enriching Defendants, for which there is  
4 no adequate remedy at law.  
5

6 **FIFTH CAUSE OF ACTION**

7  
8 **UNLAWFUL, UNFAIR, FRAUDULENT BUSINESS PRACTICES**  
9 **AGAINST DEFENDANTS UNDER CALIFORNIA BUSINESS &**

10 **PROFESSIONS CODE 17200 ET Seq.**  
11

12 101. Plaintiffs repeats and re-allege every allegation set forth in the  
13 Complaint as set forth herein.  
14

15 102. Defendants have committed all of the aforesaid acts of infringement,  
16 maliciously, deliberately, willfully, and oppressively, without regard to  
17 Plaintiffs legal, contractual, and exclusive propriety rights.  
18

19 103. Defendants acts and practices as detailed above constitute acts of  
20 unlawful, u nfair, or friendly business acts and practices within the  
21 meaning of California Business & Professions Code 17200.  
22  
23  
24  
25

26 COMPLAINT FOR TRADEMARK INFRINGEMENT; DAMAGES, AND DECLARATORY RELIEF;(1)  
27 FEDERAL TRADEMARK INFRINGEMENT [15 U.S.C. 1114 LANHAM ACT 32. 34](2) TRADEMARK  
28 DILUTION {15 U.S.C. 1125(C); CALIFORNIA BUSINESS & PROFESSIONS CODE 14330} (3) FALSE  
DESIGNATION OF ORIGIN [15 U.S.C. 1125(A)](4) COMMON LAW UNFAIR COMPETITION UNDER  
SECTION 43(A) (5) UNFAIR BUSINESS PRACTICES {CALIFORNIA BUSINESS & PROFESSIONS CODE  
17200}; AND(6) UNJUST ENRICHMENT - 26



1 104. Defendants have engaged in transactions that are in violation of  
2 numerous provisions of California law. Strict liability may be applied even  
3 if Defendants acts have violated only one of the provisions set forth above.  
4

5 105. Pursuant to California Business & Professions Code 17203, Plaintiff  
6 seeks an order from this Court prohibiting Defendants from engaging or  
7 continuing to engage in the unlawful, unfair, or fraudulent business acts or  
8 practices set forth in this Complaint and/or ordering that Defendants  
9 perform their obligations under the law and cancel any illegal obligations.  
10

11 106. Plaintiff additionally requests an order from this Court requiring that  
12 Defendants disgorge profits and return or pay Plaintiff all of Defendants ill  
13 gotten gains obtained from the illegal transactions, and or pay restitution,  
14 including the amount of monies that should have been paid if Defendants  
15 complies with their legal obligations, or, as equity requires.  
16  
17

18 107. Plaintiff further requests a Court order that an asset freeze or  
19 constructive trust be imposed over all monies in Defendants possession  
20 which rightfully belong to Plaintiff.  
21

22  
23 **SIXTH CAUSE OF ACTION**

24  
25 **UNJUST ENRICHMENT AGAINST DEFENDANTS**

26 COMPLAINT FOR TRADEMARK INFRINGEMENT; DAMAGES, AND DECLARATORY RELIEF;(1)  
27 FEDERALTRADEMARK INFRINGEMENT [15 U.S.C. 1114 LANHAM ACT 32. 34](2) TRADEMARK  
28 DILUTION {15 U.S.C. 1125(C); CALIFORNIA BUSINESS & PROFESSIONS CODE 14330} (3) FALSE  
DESIGNATION OF ORIGIN [15 U.S.C. 1125(A)](4) COMMONLAW UNFAIR COMPETITION UNDER  
SECTION 43(A) (5) UNFAIR BUSINESS PRACTICES {CALIFORNIA BUSINESS & PROFESSIONS CODE  
17200}; AND(6) UNJUST ENRICHMENT - 27

1 108. Plaintiff repeats and re-allege every allegation set forth in the  
2 Complaint, as set forth herein.  
3

4 109. By virtue of the egregious and illegal acts of defendants as described  
5 above, Defendants have unjustly enriched in an amount to be proven at  
6 trial.  
7

8 110. Defendants retention of monies gained through its deceptive business  
9 practices, infringements, acts of counterfeit and otherwise would serve to  
10 be contrary to the interests of justice.  
11

12 111. Wherefore. Plaintiff, TIA HOLLIS prays for judgment against  
13 Defendants, as follows:  
14

15 A. For damages in the amount of \$50,000,000.00 Fifty-Million dollars,  
16 and/or an amount to be proven at trial for trademark infringement  
17 under U.S.C. 1114/LANHAM ACT 43(a)  
18

19 B. For damages in an amount to be proven at trial for false designation of  
20 origin under 15 U.S.C. 1125(a)  
21

22 C. For damages in an amount to be proven at trial for trademark dilution  
23 under 15 U.S.C. 1125(c)  
24

25 D. For damages to be proven at trial for common law unfair competition.

26 COMPLAINT FOR TRADEMARK INFRINGEMENT; DAMAGES, AND DECLARATORY RELIEF;(1)  
27 FEDERALTRADEMARK INFRINGEMENT [15 U.S.C. 1114 LANHAM ACT 32. 34](2) TRADEMARK  
28 DILUTION {15 U.S.C. 1125(C); CALIFORNIA BUSINESS & PROFESSIONS CODE 14330} (3) FALSE  
DESIGNATION OF ORIGIN [15 U.S.C. 1125(A)](4) COMMONLAW UNFAIR COMPETITION UNDER  
SECTION 43(A) (5) UNFAIR BUSINESS PRACTICES {CALIFORNIA BUSINESS & PROFESSIONS CODE  
17200}; AND(6) UNJUST ENRICHMENT - 28

1 E. For damages in an amount to be proven at trial for unfair, fraudulent  
2 and illegal business practices under Business & Professions Code  
3 17200  
4

5 F. For an injunction by this Court prohibiting Defendants from engaging  
6 or continuing to engage in the unlawful, unfair, or fraudulent business  
7 acts or practices described herein.  
8

9 G. For an order from the Court requiring that Defendants provide  
10 complete accounting for equitable relief, including that Defendants  
11 disgorge and return or pay their ill-gotten gains obtained from illegal  
12 transactions entered into and pay restitution, including the amount of  
13 monies that should have been paid if Defendants complied with their  
14 legal obligations, or as equity requires.  
15  
16  
17

18 H. For an order from the Court that an asset freeze or constructive trust be  
19 imposed over all monies and profits in Defendants possession which  
20 rightfully belong to Plaintiff  
21

22 I. For destruction of the infringing articles in Defendants possession  
23 under 15 U.S.C. 1118  
24  
25

26 COMPLAINT FOR TRADEMARK INFRINGEMENT; DAMAGES, AND DECLARATORY RELIEF;(1)  
27 FEDERALTRADEMARK INFRINGEMENT [15 U.S.C. 1114 LANHAM ACT 32. 34](2) TRADEMARK  
28 DILUTION {15 U.S.C. 1125(C); CALIFORNIA BUSINESS & PROFESSIONS CODE 14330} (3) FALSE  
DESIGNATION OF ORIGIN [15 U.S.C. 1125(A)](4) COMMONLAW UNFAIR COMPETITION UNDER  
SECTION 43(A) (5) UNFAIR BUSINESS PRACTICES {CALIFORNIA BUSINESS & PROFESSIONS CODE  
17200}; AND(6) UNJUST ENRICHMENT - 29



1 J. For treble damages suffered by Plaintiff as a result of the maliciously  
2 willful and intentional infringements and acts of counterfeiting engaged  
3 in by Defendants, under 15 U.S.C. 1117(b)  
4

5 K. For damages in an amount of \$50,000,000.00 Fifty-Million dollars,  
6 and/or any amount to be proven at trial for unjust enrichment  
7

8 L. For all costs of suit; and

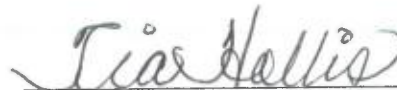
9 M. For such other and further relief as the Court may deem just and  
10 equitable  
11

12  
13 **JURY DEMAND**  
14

15 **Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure,**  
16 **Plaintiff TIA HOLLIS respectfully demands trial by jury on all**  
17 **issues raised by this Complaint.**  
18

19 **DATED: March 13, 2024**

**Respectfully submitted**

20  
21 

22 **TIA HOLLIS IN PRO-PER**  
23  
24  
25

26 COMPLAINT FOR TRADEMARK INFRINGEMENT; DAMAGES, AND DECLARATORY RELIEF;(1)  
27 FEDERAL TRADEMARK INFRINGEMENT [15 U.S.C. 1114 LANHAM ACT 32. 34](2) TRADEMARK  
28 DILUTION {15 U.S.C. 1125(C); CALIFORNIA BUSINESS & PROFESSIONS CODE 14330} (3) FALSE  
DESIGNATION OF ORIGIN [15 U.S.C. 1125(A)](4) COMMON LAW UNFAIR COMPETITION UNDER  
SECTION 43(A) (5) UNFAIR BUSINESS PRACTICES {CALIFORNIA BUSINESS & PROFESSIONS CODE  
17200}; AND(6) UNJUST ENRICHMENT - 30

# **EXHIBIT A**

# United States of America

## United States Patent and Trademark Office

# Crips

**Reg. No. 5,877,377**

**Registered Oct. 08, 2019**

**Int. Cl.: 35**

**Service Mark**

**Principal Register**

Crips LLC (CALIFORNIA LIMITED LIABILITY COMPANY)  
3720 Barham Blvd #107  
Los Angeles, CALIFORNIA 90068

CLASS 35: Association services, namely, promoting the interests of Community Organizers; Club services, namely, promoting the interests of Community Organizers; Organizing chapters of local neighborhood clubs and promoting the interests of the members thereof, including by promoting public safety, promoting job training and employment, and organizing job fairs; Political action committee services, namely, promoting the interests of Community Organizers in the field of social change; Providing marketing solutions, namely, arranging and conducting community events for promotional purposes

FIRST USE 1-1-1969; IN COMMERCE 1-1-1984

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

SER. NO. 88-025,930, FILED 07-05-2018



*Andrei Iancu*

Director of the United States  
Patent and Trademark Office



# **EXHIBIT B**

**United States of America**  
United States Patent and Trademark Office

# Crips

Reg. No. 6,926,377  
Registered Dec. 13, 2022  
Int. Cl. 41  
Service Mark  
Principal Register

Crips LLC, CALIFORNIA LIMITED LIABILITY COMPANY  
5455 Wilshire Blvd. Ste. 2109  
Los Angeles, CALIFORNIA 90048

CLASS 41: Cinematograph services; Entertainment in the nature of broadcast games; Entertainment services in the nature of production of television film; Entertainment; namely, production of music, television; Music production services; Music production services for use in television films and/or Organizing community sporting and cultural events.

FIRST USED 6-1-2013 IN COMMERCE 6-1-2013

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR.

OWNER OF U.S. REG. NO. 6,926,377

The marking "CRIPS" has no meaning in a foreign language.

SER. NO. 96,975,506 FILED 09-19-2020



*Katherine Kelly Vidal*

Director of the United States  
Patent and Trademark Office



# **EXHIBIT C**



# United States of America

## United States Patent and Trademark Office

# Bloods

**Reg. No. 6,026,461**

**Registered Apr. 07, 2020**

**Int. Cl.: 35**

**Service Mark**

**Principal Register**

Bloods LLC (CALIFORNIA LIMITED LIABILITY COMPANY), DBA Bloods LLC  
3720 Barham Blvd #107  
Los Angeles, CALIFORNIA 90068

CLASS 35: Association services, namely, promoting the interests of Community Organizers; Club services, namely, promoting the interests of Community Organizers; Organizing chapters of a Brotherly Love Overrides Oppression and Destruction club and promoting the interests of the members thereof; Political action committee services, namely, promoting the interests of Community Organizers in the field of social change as well as promoting public safety, training and employment; providing marketing solutions for community organizers

FIRST USE 1-1-1972; IN COMMERCE 1-1-1984

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

SER. NO. 88-025,901, FILED 07-04-2018



*Andrew L. Hanen*

Director of the United States  
Patent and Trademark Office



# **EXHIBIT D**



# Crips Issu COMPLEX Family: 'There Will Absolutely Be No Trademark Legal Battle'

The organization has conceded to the family's wishes.



BY XAVIER HAMILTON

Jul 03, 2019





Getty

Image via Getty/Bennett Raglin/BET

Since Nipsey Hussle's passing his family has been overwhelmed with several legal battles. Now their burdens have gotten a little lighter as their case against the official Crips organization has been resolved.

According to *The Blast*, an official for the Crips LLC released a statement claiming that the organization that was formed on behalf of the Crips street gang will not move forward with trademarking Hussle's "The Marathon Continues" slogan. They also issued an apology to Hussle's family while offering to relinquish all rights to Nipsey's intellectual property.

"There will absolutely be no trademark legal battle between their organization and Blacc Sam, brother of the late Nipsey Hussle," the organization told *The Blast*. "[The Crips] respectively vows to support the wishes of Lauren London and the Asghedom family... We realize that our actions may have been offensive and we have reached out to his family, respectively Nip's sister, Samantha Smith."

The organization's corporate communications director, William King Hollis, went on to explain that at the time of Hussle's death the rapper and the Crips LLC were working on a "mutual collaboration" that required the slogan. This was why they filed a trademark on the phrase, not to undercut the family during their time of grief.

"We are deeply sorry for any disruptions and melee that the trademark acquisition may have caused to his family, friends and fans," Hollis said.

As reported, Hussle's brother Blacc Sam filed an application to trademark the phrase in May. Less than two weeks prior, the Crips LLC made their request to trademark "The Marathon Continues." According to the organization, they wanted to use the

slogan to promote "gang intervention" programs and community activism. Although neither application mentioned the other, Blacc Sam and the Crips were destined for a legal standoff to see who has rights to the phrase. Fortunately, this was averted by the organization conceding to the family's wishes.

## Related Stories

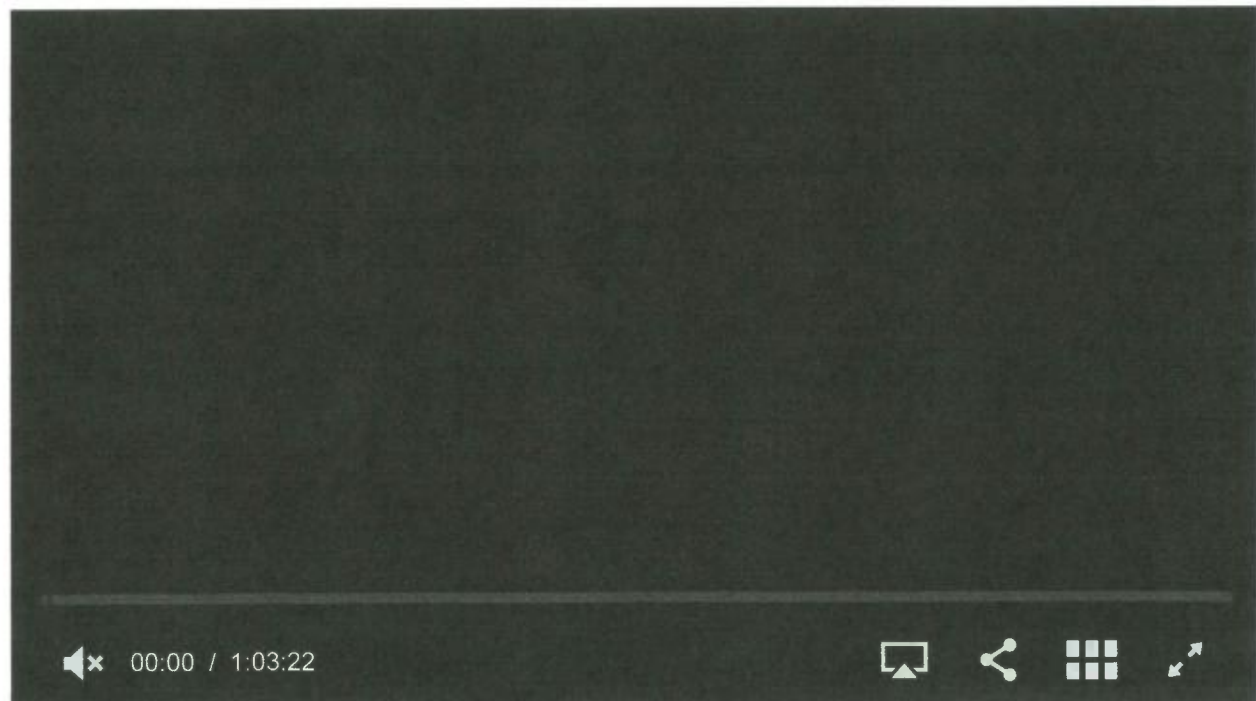


Nipsey Hussle, a True Hometown Hero



Blueface Pays Respects to Nipsey Hussle

FAMILY GANGS COURT CRIPS NIPSEY HUSSLE NEWS  
**SHARE THIS STORY**



# **EXHIBIT E**



**EXCLUSIVE**

## **NIPSEY I'USSLE ESTATE SETTLES 'MARATHI'ON' BEEF WITI' CRIPS**



3/25/2021 2:03 PM PT

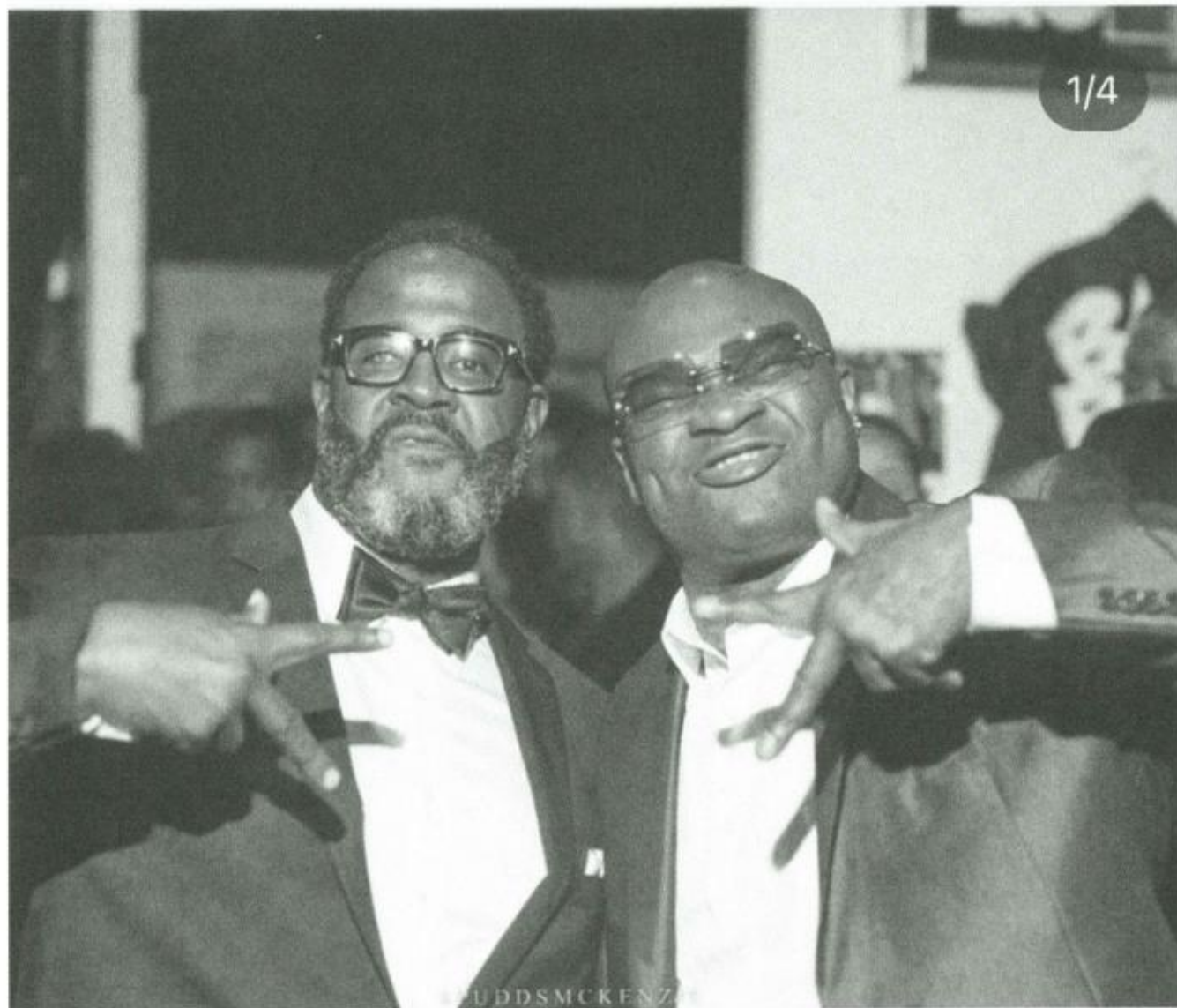
The marathon continues, but the marathon feud **Nipsey Hussle's** estate had with the Crips is over ... thanks to a settlement of a lawsuit.

Nipsey's brother, **Samuel Asghedom**, just informed the court in writing that the estate's reached the settlement with Crips LLC. The notice was filed Thursday in L.A. County court.

# **EXHIBIT F**

**higherlevelbear**

...

Liked by **cuzlightyear** and **572 others**

higherlevelbear Happy C day to my brother @since we first met in 1988 when Lockhart said "Come up here, this dude say he a Crip". 🤔. You stood up Like... more

[View all 69 comments](#)**cuzlightyear** big N's ❤️

July 10, 2020





 Liked by **therealrogerbonds** and **728 others**

**higherlevelbear** I know some of the stuff we all see on social media is considered to be entertaining, but there is a point where we as a people/community must draw A line somewhere. A long standing RULE is and has always been "keep the women and children out of it, period". "Women and children are off limits". So when do WE DECIDE to enforce that rule and use our voice as do other people of power and influence to throw a "flag on the play" and suspend the bs from social media, deeming it unsuitable to be promoted, seen or heard? #attentionseeker #chaoscreator #instigator #aggitator #igniter #aggravator #trapsetter #itsaSetup #neverreactoffemotions #stavfocused #GodfighthsforUS #cantaveitanvenerav

# **EXHIBIT G**

**babyhairedgepro**

Los Angeles, California

...

# **L.A. Woman Who Was Jailed Falsely Accused & Facing 21 Years in Prison Represents Herself In Court Gets Charges Dismissed And Becomes Inventor Of Million Dollar Baby Hair Brush Brand**



# **EXHIBIT H**





higherlevelbear

...



Liked by nfnc thelabel and 607 others

higherlevelbear Happy C day @snoopdogg Love and respect Crip!!!



Liked by imgonzoe and 375 others

higherlevelbear #triggerwarningwithkillermike 🔥 🔥 🔥

Viewing and Discussion w/ @killermike last night. 💪

@theory\_comm 🔥 #cripacola #bloodpop 🖤 🖤 ... more

View all 16 comments

bigboi NaybaHood !



imgonzoe @bigboi #nh

50





**higherlevelbear**

Liked by **therealrogerbonds** and **443 others**

**higherlevelbear** Damn, this news got me down. 1e11um N peace to my big bro #Monster My condolences to his family and his Homies @therealdubwc @icecube... more

1:39

#52



HIGHERLEVELBEAR

Posts



higherlevelbear



bigu1



Liked by cuzlightyear and 290 others

higherlevelbear #Repost @bigu1 with @make\_repost

...

Me and My Partners @higherlevelbear @qcmceo\_p... more

View all 10 comments

nelsondixon Awesome. Where do I find cripcola



higherlevelbear @nelsondixon The Trap museum



October 28, 2020

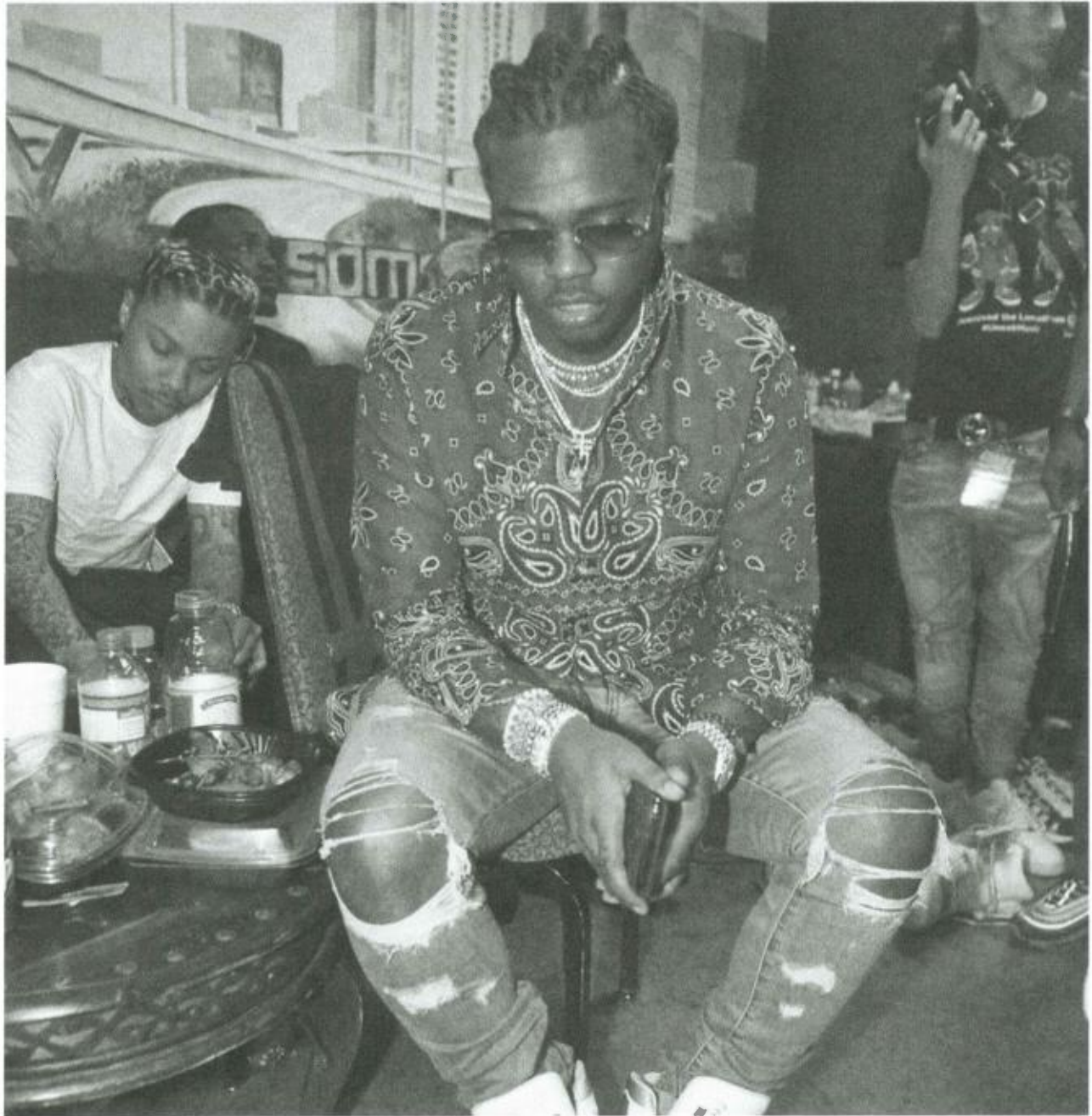






higherlevelbear

...



Liked by cuzlightyear and 232 others

higherlevelbear sendN the biggest Happy C day to my Naybor @gunna Cuz, I hope the world kNowes you earned this shit the left way by hard WorC. You always been SOLID Loc. I also hope that all our homies are inspired and motivated by your accomplishments. #SPC #Westside #FourSeason #Blvd #OldNat #NawfSide Keep pushN the line Serge' #RipTroup #RipbigC53



higherlevelbear



Liked by therealrogerbonds and 248 others

higherlevelbear The Homies!!! Gotta Respect these two  
MEN, and their Journey #thedoggpound #DPGC  
@dazdillinger @krupt\_gotti #LBC... more

View all 14 comments

5ive\_mics 🐕 🐕 🐕

54







higherlevelbear

#55

College Park, Georgia



livingthaineo



Liked by cuzlightyear and 717 others

higherlevelbear Your day is Coming up bro 12/10. We gon rep for you from Atl-Chi-LA-Miami-Vegas-NYC 🙄🙄🙄



#LLkingTroup #AlwaysLoveandRespect

#missyoubro @tip @nelly 55



higherlevelbear

...



Liked by nfncthelabel and 679 others

higherlevelbear @nfncthelabel We just Roll different!! We StiC by the Code. To get it, you must give it, we govern ourselves w/ Self Respect, we stand up Straight, we push our line to improve upon ourselves w/o demeaning anyone else. #Love&Respect @mrrugs @bkrube @troubleman31 @qcmceo\_p @hoodgod\_ #afewGoodmen @diddy #revoltsummit2019 shout out @dazdillinger for the 🍑

View all 35 comments

5ive\_mics 🔥

56





# **EXHIBIT I**



VARIETY



Just Add Chocolate  
The Coffee Bean & Tea Leaf

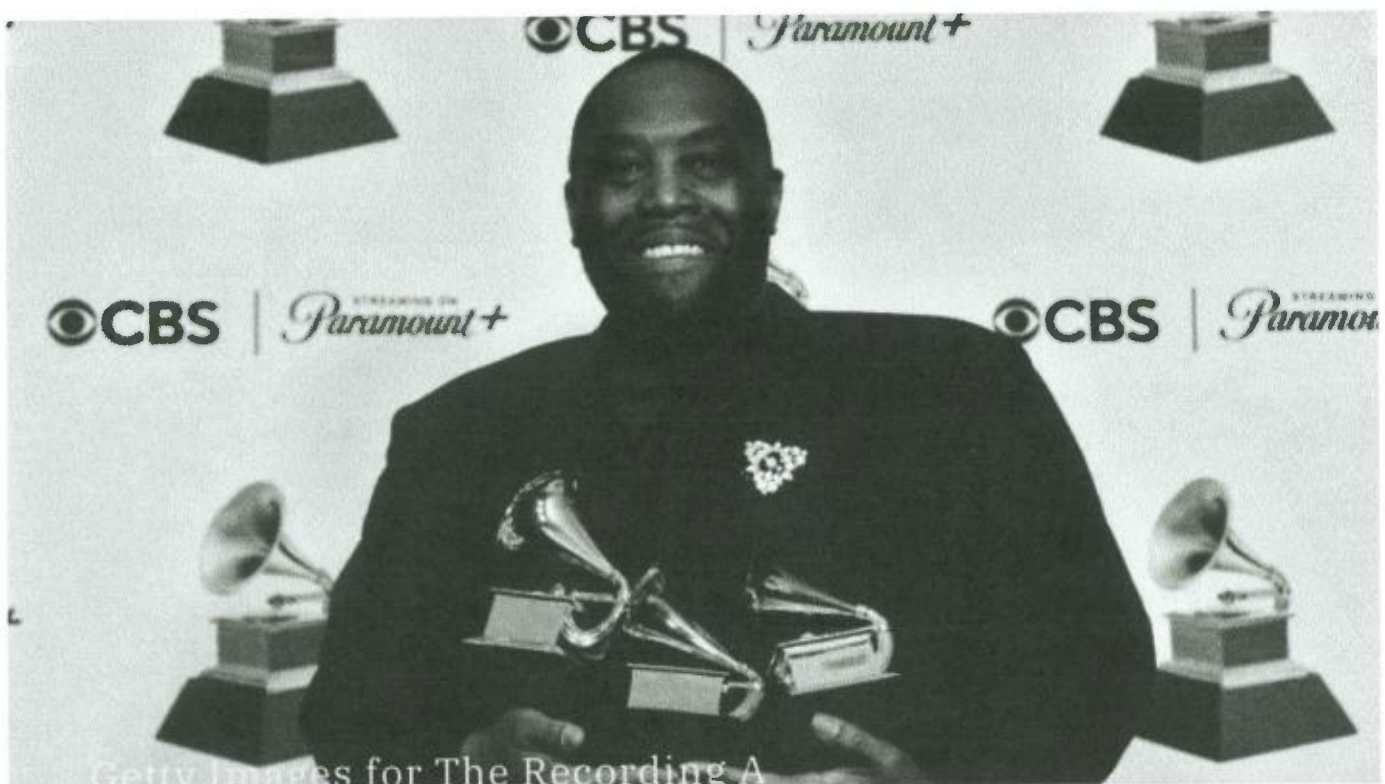


HOME > MUSIC > NEWS

February 4, 2024 4:49pm PT

# Rapper Killer Mike Arrested at Grammys for Battery After Winning 3 Awards

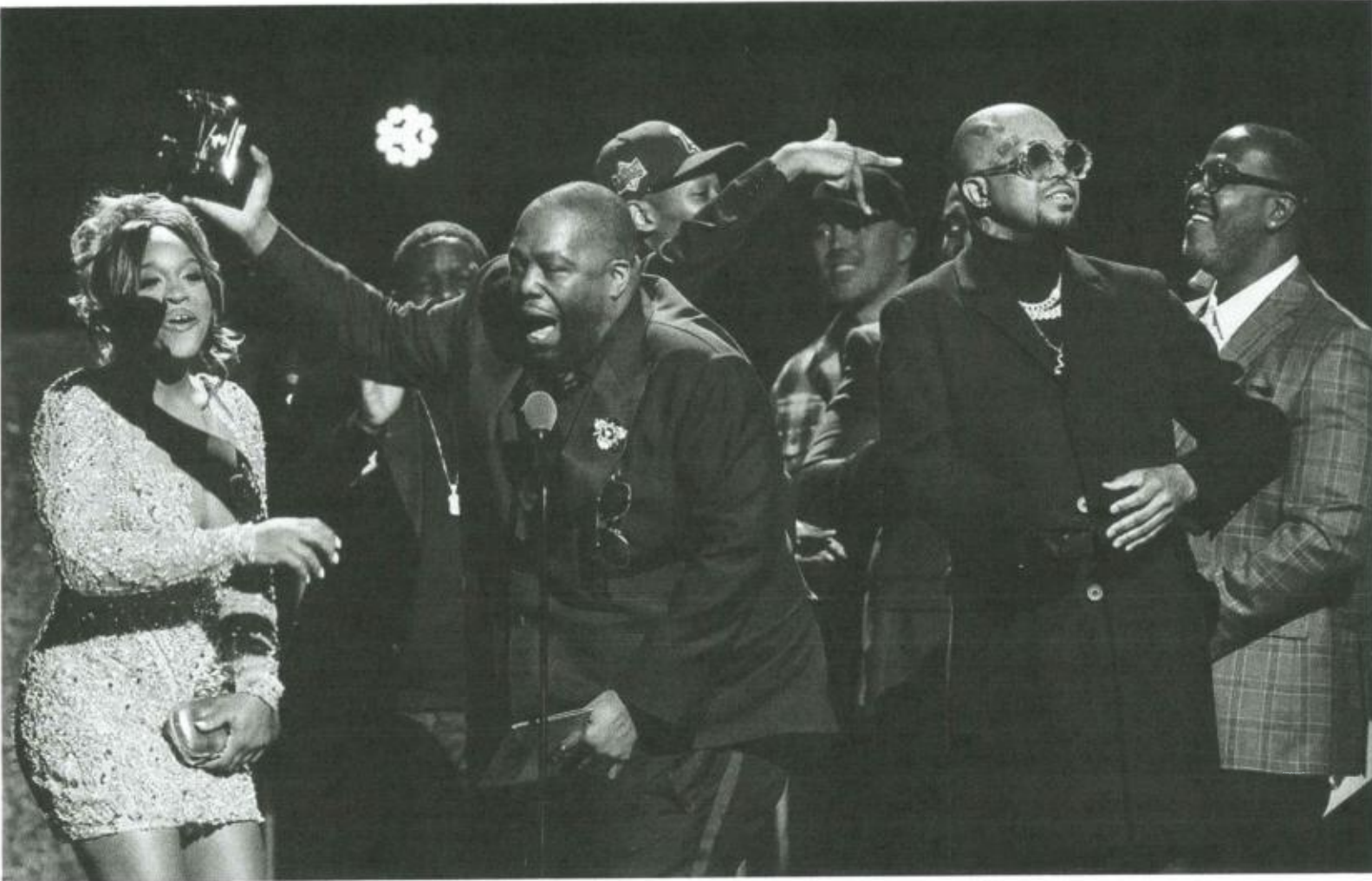
By Jordan Moreau



Getty Images for The Recording A

**higherlevelbear**

Beverly Hills, California



Liked by cuzlightyear and 766 others

**higherlevelbear** Thankful for this One Big win/moment in time. The fact of the matter is there were soooooo many many things (battles/loses/wins) over the last past... more

# **EXHIBIT J**





Instagram



CRIP

The Raymond Washington Story  
A 4-Part Series

---

EPIC STORY- OSCAR  
WINNING DESIGNER  
DOPE- WRITER  
PROCUCER EMPIRE  
PRE- SNOWFALL  
COMING SOON 2021

@KENYAWAREFILMS

@BIGU1

@JARONMARQUIS



lel



# **EXHIBIT K**



Phone

4:25 PM



Will >

Feb 20, 2019, 12:59 PM



D meet Will, Will meet D.  
D is my guy who i told you  
about who the mother of  
his child Owns the word  
Crip and Blood. Wanted  
to connect you both. D is  
family and a music  
industry vet.. @

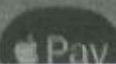
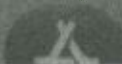
Nice to meet you over  
text , Will. I would like to  
connect you to Tia ,my son  
mom whenever time  
permits

Thanks bear! For sure. I  
get back to LA in a few  
days and back working.  
Just let me know and we  
will make it happen

colodias all iust notice



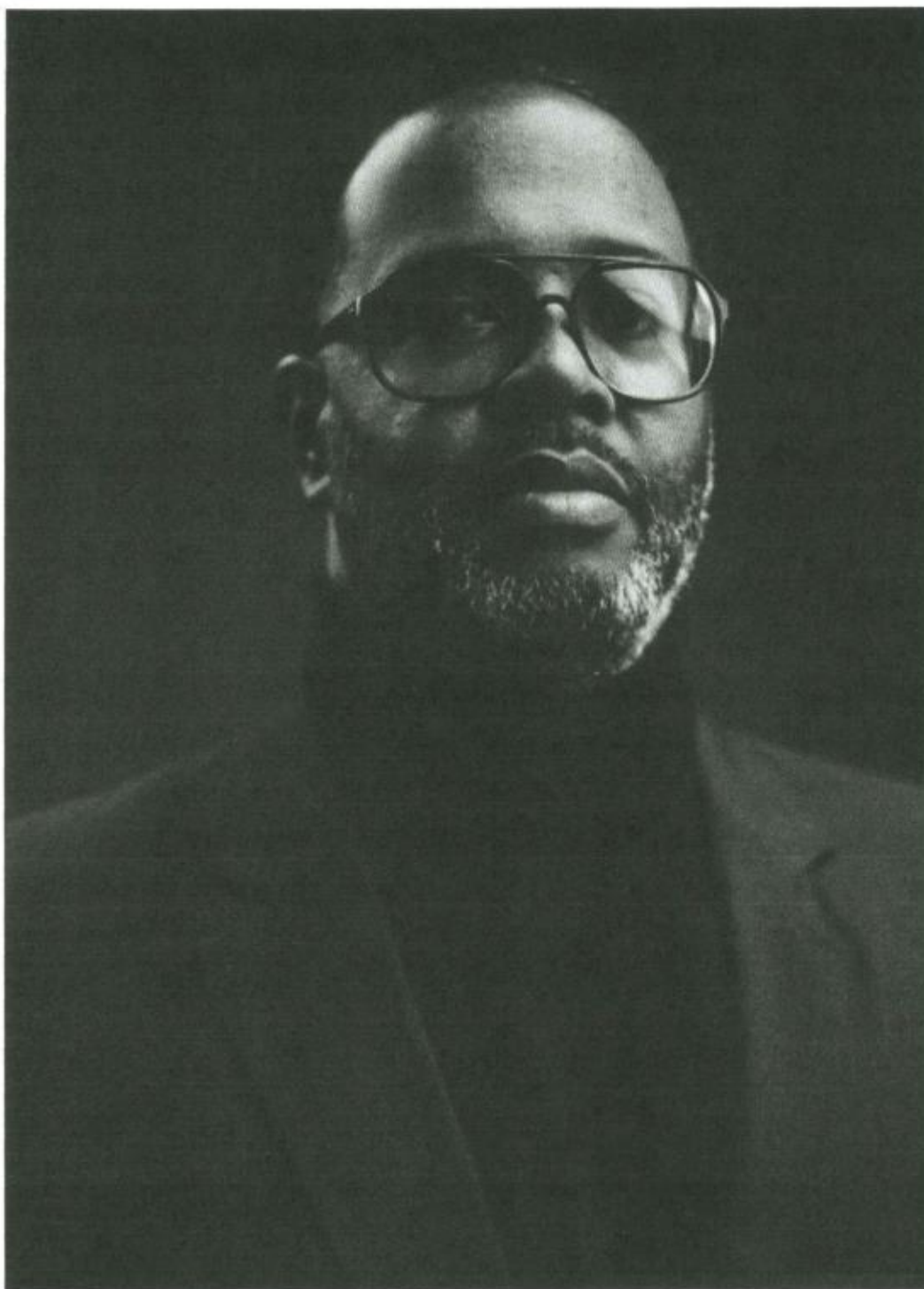
Text Message





higherlevelbear

...



Liked by **willisactive** and **380 others**

**higherlevelbear** @bearstrongnp0

@bear\_with\_me\_podcast Gods grace and mercy.

#Imabeliever... more

[View all 32 comments](#)

November 1, 2022





higherlevelbear

...

Courtney "Bear" Sills is one of the entertainment industry's most innovative figures. In each of those spaces, the College Park, GA native has impacted culture and led people to find their paths. Continuing on that path in an act of service, he is Founder/President of Bear Strong, Inc. By way of this initiative he is committed to assisting with the transformation of the community that fostered him. His goal is to inspire the youth and assist them with understanding that their mind is their strongest muscle. As a skilled martial artist, he learned core principles of mindfulness as a practice. He wants to send the message that it is important to think before you act, hence the logo of the seemingly contemplating bear. Exercise your mind as a muscle.



Liked by **willisactive** and **380 others**

**higherlevelbear** @bearstrongnpo

@bear\_with\_me\_podcast Gods grace and mercy.

#Imabeliever... more

View all 32 comments

November 1, 2022

**higherlevelbear**

...

An astute businessman, this is simply an addition to his diversified portfolio of strategic alliances.

Sills is a founding member of the label imprint No Face No Case that launched in 2019. He served as an associate producer of the VH1 documentary "***The Untold Story of Atlanta Rise,***" and is a partner in the beverage brand **Crip-a-Cola/Blood Pop** alongside Killer Mike, where he also functioned as a casting agent on behalf of the brand for the series "***Trigger Warning,***" on Netflix.

Sills' most honorable act is being the husband to Dr. Tina Sills and a father to three sons, Corey, Josiah and Courtney II.

# **EXHIBIT L**



To: Mr. Charles J. Wilson  
Exotic Pop Distribution, LLC  
2100 West Loop South # 800  
Houston, TX 77027

**URGENT DEMAND**

Dear Mr. Charleston Wilson,

October 24, 2022

I am a member of Crips LLC and presently representing the organization in this matter.

Please be advised that your company and all of its affiliates are currently selling, offering and distributing a beverage Crip-A-Cola. This trademarked brand which is owned and used in commerce by our organization, Crips LLC has not granted or licensed any permission to you, your company or affiliates to offer, give, sell or distribute this product.

We demand that you, your company and all affiliates either turnover or destroy any and all merchandise carrying the Blood(s) and or Crip(s) trademark immediately. Our organization will give you, your company and all affiliates to meet this demand by no later than October 31, 2022.

To that end, please;

- 1) Deliver/destroy all inventory with our trademark and
- 2) Please notify us by certified mail no later than October 31, 2022 confirming compliance of said demand.

Please note that if the above demand is not met we will be forced to pursue legal matters.

Sincerely,

A handwritten signature in black ink, appearing to read 'T.L. Hollis'.

T.L. Hollis  
Director

**Crips LLC & Bloods LLC**

323.825.9300  
5455 Wilshire Blvd Ste 2100  
Los Angeles, CA 90036

(CERTIFIED COPY)  
68





October 13, 2022

7:44 PM

Edit



exoticpop  
Atlanta, Georgia



103 likes

exoticpop Happy C Day @paid\_getn\_paid of @cripacola

69

12:49

October 13, 2022  
9:05 AM

Edit



## Your cart

**Crip-a-Cola**

- 2 +

**\$100.00**

**i** Special instructions for seller

**Subtotal****\$100.00**

All orders will be processed within 3-5 business days.  
Please keep in mind Exotic Pop is closed Saturday &  
Sunday and packages will not be processed or shipped  
these days.

# **EXHIBIT M**





June 2, 2022

11:34 PM

Edit



higherlevelbear



Liked by willisactive and 390 others

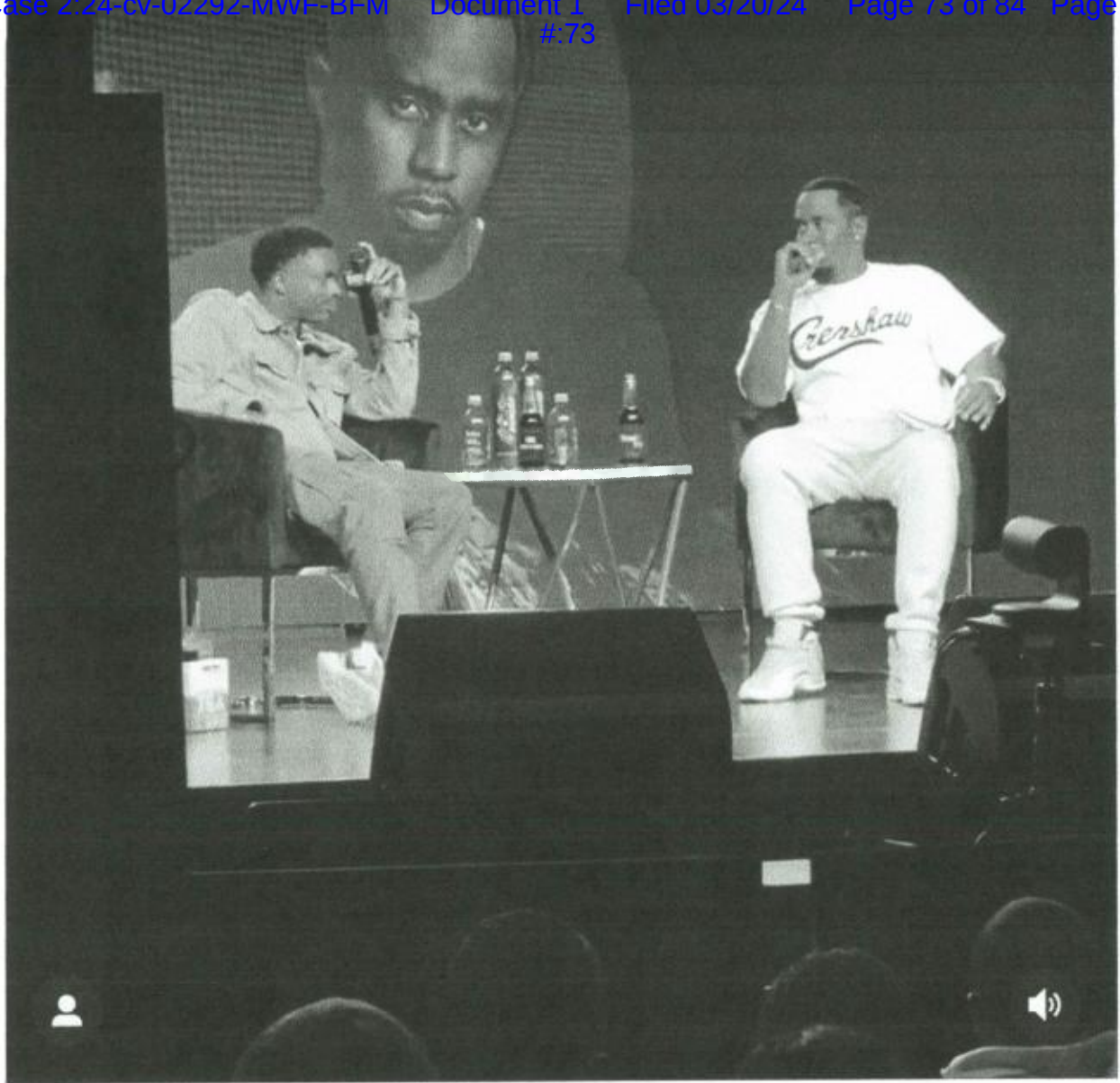
higherlevelbear The most interesting man in the world

@troubleman31 Stay thirsty my friends..

#changingthenarrative @cripacola #bloodpop Society would like to Group all people associated or affiliated in one small limited terrible circle, GUESS WHAT? That's why We are CHANGING THE NARRATIVE!!

#Thinkoutsidethebox #reinvention #revolution

#CocaineMafia #CameThruTheCity @killermike



3,727 views

exoticpop **B** BLOOD POP & CRIP A COLA ALERT

@diddy on how to deal with HATERS!! @revoltsummit

@exoticpop is proud to announce that we are the official exclusive distributor of @cripacola & @bloodpopcola!! We are also proud to announce that we will be donating a large portion of the proceeds to #developingoptionsLA and #developingoptionsATL, a public charity!! With each purchase of @bloodpopcola & @cripacola, your charitable contributions will benefit our beloved communities of color all across the country. S/O @paid\_getn\_paid aka @exoticpop\_\_atl for being one of the visionaries of the brand. S/O @killermike for bringing this vision to life!! @vincestables & @diddv #teamexoticpop!!





higherlevelbear

...



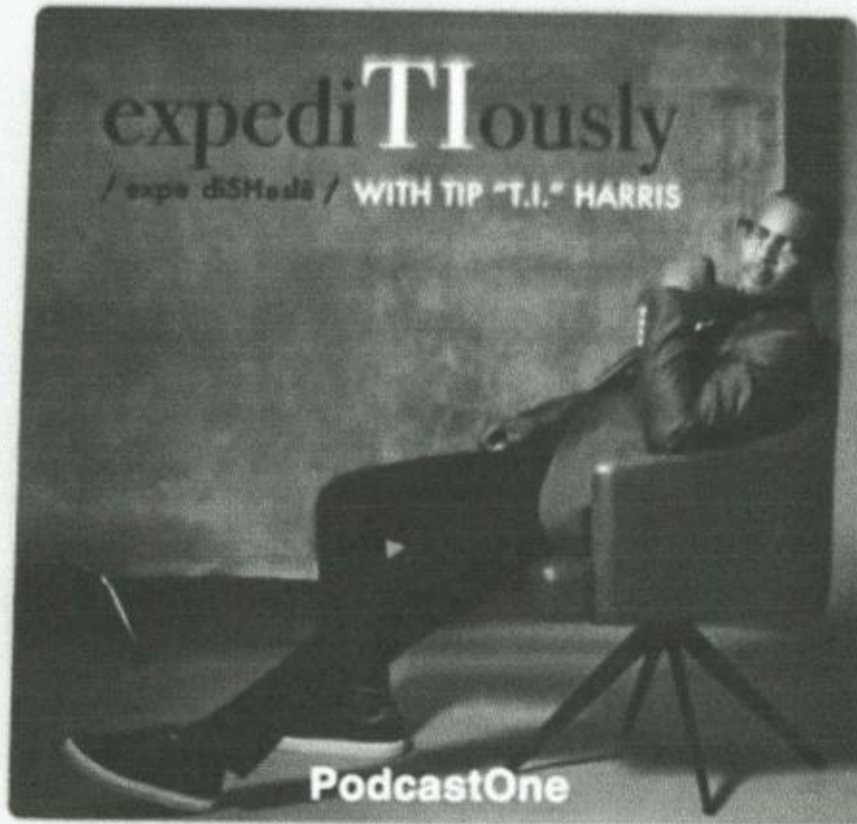
Liked by willisactive and 227 others

higherlevelbear Successful trip to LA..

#ChangingtheNarrative #alhamdulillah @dynastydoe  
@blue\_lbc @killermike @snoopdogg @bigu1 and Myself.  
@cripacola @bloodpopcola Respect to all the bro's that  
we met and delivered product to. #historyisbeingmade





Atlanta, Georgia



31:17


-2:29:12

## Killer Mike- The Atlanta Way

 expediTlously with Tip "T.I." Harris 



7,987 views

**exoticpop**  @exoticpop is proud to announce that we are the official exclusive distributor of @cripacola & @bloodpopcola!! We are also proud to announce... more

[View all 19 comments](#)

October 2, 2019



# **EXHIBIT N**

#77  
**Trademark/Service Mark Application, Principal Register**

Serial Number: 88472671

Filing Date: 06/13/2019

The table below presents the data as entered.

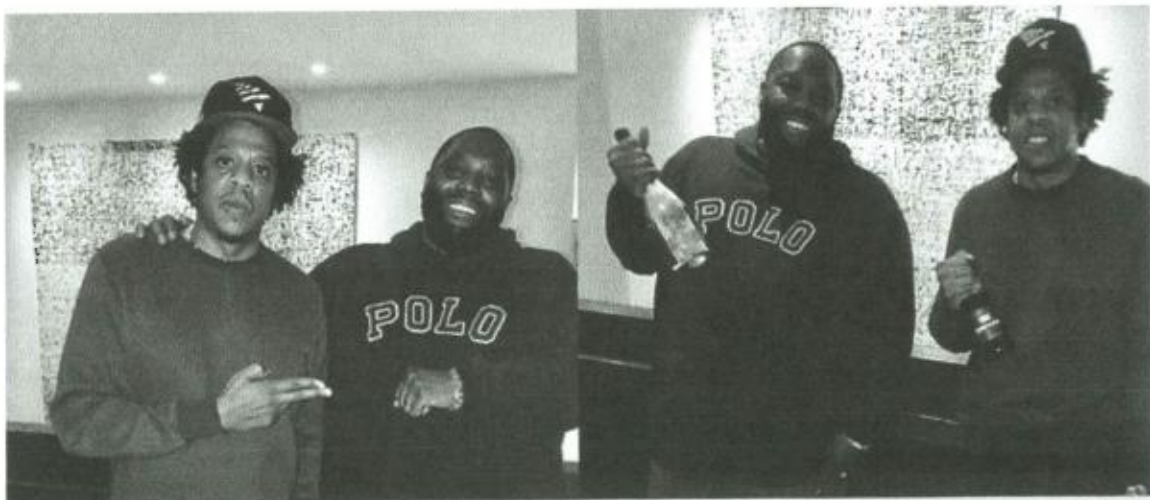
Input Field	Entered
SERIAL NUMBER	88472671
<b>MARK INFORMATION</b>	
*MARK	\\TICRS\EXPORT17\IMAGEOUT 17\88472671.xml\\RFA0002.JPG
SPECIAL FORM	YES
USPTO-GENERATED IMAGE	NO
LITERAL ELEMENT	CRIP-A-COLA
COLOR MARK	YES
COLOR(S) CLAIMED (If applicable)	The color(s) blue and white is/are claimed as a feature of the mark.
*DESCRIPTION OF THE MARK (and Color Location, if applicable)	The mark consists of the words CRIP-A-COLA in white stylized font on a blue background. Above the words is a white stylized infinity symbol with the right portion removed in the shape of a sideways V.
PIXEL COUNT ACCEPTABLE	YES
PIXEL COUNT	800 x 250
REGISTER	Principal
<b>APPLICANT INFORMATION</b>	
*OWNER OF MARK	The Michael Render Group, LLC
*STREET	5665 New Northside Drive, Ste. 110
*CITY	Atlanta
*STATE (Required for U.S. applicants)	Georgia
*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. and certain international addresses)	30328
<b>LEGAL ENTITY INFORMATION</b>	
TYPE	limited liability company
STATE/COUNTRY WHERE LEGALLY ORGANIZED	Georgia
<b>GOODS AND/OR SERVICES AND BASIS INFORMATION</b>	
INTERNATIONAL CLASS	025
*IDENTIFICATION	Clothing, namely shirts and sweatshirts
FILING BASIS	SECTION 1(b)
INTERNATIONAL CLASS	032
*IDENTIFICATION	Beverages, namely soft drinks
FILING BASIS	SECTION 1(a)



# **EXHIBIT O**

# Jay Z now part owner of the "Crip-A-Cola" soda company by Killer Mike

Killer Mike launched a new soda venture in 2019: where he got Crips and Bloods to come together to collaborate on "Crip-a-Cola" and "Blood Pop." He spoke about the collaboration during an interview on *The Late Show with Stephen Colbert*, and he explained that he wanted to introduce a legal product that would benefit the gang rivalry.





HIPHOP CROWN NATION

Aug 22, 2020

## Jay Z now part owner of the “Crip-A-Cola” soda company by Killer Mike

Killer Mike launched a new soda venture in 2019: where he got Crips and Bloods to come together to collaborate on "Crip-a-Cola" and "Blood Pop." He spoke about the collaboration during an interview on *The Late Show with Stephen Colbert*, and he explained that he wanted to introduce a legal product that would benefit the gang rivalry.



## Jay-Z to Become Part Owner of “Crip-A-Cola”

On Friday (Aug. 20), Consisting of Atlanta *native* rapper *Killer Mike* announces Shawn Corey Carter partnership with “Crip-A-Cola” on instagram [via] I sincerely appreciate my brother and 🐶 status Emcee/entrepreneur, Jay Z. He is a model for taking the “Dope Man” mentality and advancing it into





Google

Sign in



All

Videos

Images

Shopping

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Books

Maps

Flights

Finance

Search

# Entrepreneur

Song by Pharrell Williams



Overview

Lyrics

Videos

Listen

I am black ambition  
I am always whisperin'  
They keep tellin' me I will not  
But my will won't listen  
Gravity on a black man  
With everything on his back and  
His family and passion  
If the doors ain't crackin'

You gotta let go (let go)  
If you wanna fly, take the leap  
You gotta risk it all (risk it all)  
Or there'll be lots of things you'll never see  
You gotta let, let go  
'Cause you never know  
What's in store  
Mr. Entrepreneur

In this position with no choice  
A system imprison young black boys  
Distract with white noise  
The brainwashed become hype boys  
Third eye dilate  
You ain't supposed to make it off Section 8  
Robbin' Peter just to pay Paul  
Prepare to risk everything

You need to let go (let go)  
If you wanna fly, take the leap  
You gotta risk it all (risk it all)

Or there'll be lots of things you'll never see  
Remember, black is space  
And it's the color of your face  
There will be no sunny days  
If Black went away

Black man, Black man, Black man  
Black man, Black man, Black man  
Black man, Black man, Black man  
Black man, Black man, Black man  
Black man, Black man, Black man  
Black man, Black man, Black man  
Black man, Black man, Black man  
Black man, Black man, Black man

Black man, Black man, Black man  
Black man, Black man, Black man  
Black man, Black man, Black man  
Black man, Black man, Black man  
Black man, Black man, Black man  
Black man, Black man, Black man  
Black man, Black man, black man  
Black man, Black man, Black man

Don't go chasin' waterfalls  
Please stick to the drip that you're used to  
They don't make 'em like they used to

Uh, lies told to you  
Through YouTubes and Hulus  
Shows with no hues that look like you do  
Black Twitter, what's that?  
When Jack gets paid, do you?  
For every one Gucci, support two FUBU's  
Sippin' Crip-a-Cola  
Consumer and a owner  
'Til we all vertically integrated from the floor up  
D'Ussé pour up  
Sip Ace 'til I throw up  
Like gang signs, 'cept I bang mines for both ya  
Serial entrepreneur, we on our own  
Stop sittin' around waitin' for folks to throw you a bone  
If you can't buy the building, at least stock the shelf (word)  
Then keep on stacking 'til you stocking for yourself, uh  
See everything you place after black

# **EXHIBIT P**



U.S. Application Serial No. 88472671

Mark: CRIP-A-COLA

**Correspondence Address:**

KRISTINE A. HETZ  
ROBINS KAPLAN LLP  
800 LASALLE AVENUE, STE 2800  
MINNEAPOLIS, MN 55402

**Applicant:** The Michael Render Group, LLC

**Reference/Docket No.** 128495 0000

**Correspondence Email Address:**  
khietz@robinskaplan.com

**SUSPENSION NOTICE  
No Response Required**

**Issue date: September 06, 2019**

**The application is suspended** for the reason(s) specified below. *See* 37 C.F.R. §2.67; TMEP §§716 *et seq.*

**USPTO database searched; prior-filed potentially conflicting pending application(s) found.** The trademark examining attorney searched the USPTO database of registered and pending marks and found no conflicting registered marks that would bar registration under Trademark Act Section 2(d). 15 U.S.C. §1052(d); TMEP §704.02. However, a mark(s) in a prior-filed pending application(s) may bar registration of applicant's mark.

The pending application(s) below has an earlier filing date or effective filing date than applicant's application. If the mark in the application(s) below registers, the USPTO may refuse registration of applicant's mark under Section 2(d) because of a likelihood of confusion with the registered mark(s). 15 U.S.C. §1052(d); *see* 37 C.F.R. §2.83; TMEP §§1208.02(c). Action on this application is suspended until the prior-filed application(s) below either registers or abandons. 37 C.F.R. §2.83(c). Information relevant to the application(s) below is provided in this letter.

- U.S. Application Serial No(s). 88312848 and 88025930

**Suspension process.** The USPTO will periodically check this application to determine if it should remain suspended. *See* TMEP §716.04. As needed, the trademark examining attorney will issue a letter to applicant to inquire about the status of the reason for the suspension. TMEP §716.05.

**No response required.** Applicant may file a response, but is not required to do so.

Edward Payabyab  
/Edward Payabyab/  
Trademark Examining Attorney  
Law Office 128  
(571) 272-0021  
edward.payabyab@uspto.gov